

**FILED**

OCT 28 2019

UNITED STATES BANKRUPTCY COURT  
SAN FRANCISCO, CA

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Attorneys for GLORIA RUCKMAN; ROBERT RUCKMAN;  
a minor by and through his guardian ad litem ROBERT RUCKMAN;  
ROBERT RUCKMAN; AMALIA LEAL; and GILARDO LEAL

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

and

PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas & Electric Company  
☒ Affects both Debtors

\*All papers shall be filed in the Lead Case  
No. 19-30088 (DM)

Case No. 19-30088-DM

Chapter 11

RS No. LKW-001

Date: November 19, 2019

Time: 10:00 a.m.

Place: 450 Golden Gate Avenue, 16<sup>th</sup> Floor  
San Francisco, CA

Judge: Honorable Dennis Montali

Objection Deadline: November 14, 2019

Time: 4:00 p.m. (Pacific Time)

**DECLARATION OF LEONARD K. WELSH IN SUPPORT  
OF MOTION TO ABSTAIN AND FOR RELIEF FROM AUTOMATIC STAY TO  
PERMIT LAWSUIT TO PROCEED TO TRIAL AND CONCLUSION**

I, Leonard K. Welsh, declare:

1. I am an attorney at law admitted to practice law before all courts in the State of California. I am admitted to practice law in United States District Court for the Northern

1 District of California and I am the owner of the Law Offices of Leonard K. Welsh. The Law  
2 Offices of Leonard K. Welsh is the attorney of record for Gloria Ruckman; Robert Ruckman, a  
3 minor by and through his guardian ad litem Robert Ruckman; Robert Ruckman; Amalia Leal;  
4 and Gildardo Leal ("Plaintiffs") in the above-referenced case.

5  
6 2. Pacific Gas & Electric Company and PG&E Corporation ("Debtors") filed  
7 Voluntary Petitions for Non-Individuals Filing for Bankruptcy ("the Petitions") on January 29,  
8 2019 in the United States Bankruptcy Court for the Northern District of California after  
9 Plaintiffs filed a lawsuit against Pacific Gas & Electric Company ("PG&E") and others in the  
10 Kern County Superior Court ("the Lawsuit"). Copies of the Petitions are included in the  
11 Exhibits to Motion to Abstain and for Relief from Automatic Stay to Permit Lawsuit to Proceed  
12 to Trial and Conclusion ("the Exhibits") on file herein as Exhibits "A" and "B".

13 3. I believe cause exists for modifying the automatic stay to permit the Lawsuit  
14 proceed in the Kern County Superior Court. This is true because:

15 a. judicial economy will be promoted by allowing Plaintiffs' claims against  
16 PG&E and the other defendants named in the Lawsuit ("the Other Defendants") to be  
17 tried and liquidated in one forum and one action,

18  
19 b. the Lawsuit is At Issue and ready to proceed and to trial,

20 c. the issues involved in the Lawsuit are found exclusively in state law,

21 d. Plaintiffs' claims against PG&E are inextricably connected with their  
22 claims against the Other Defendants,

23 e. the Kern County Superior Court has stayed prosecution of the Lawsuit  
24 until Plaintiffs obtain relief from the automatic stay from the Bankruptcy Court, and  
25  
26  
27  
28

1 f. I know of no prejudice that will occur to PG&E or any other person if the  
2 Motion is granted.

3 4. The foregoing statements are within my personal knowledge and I can testify  
4 competently thereto if called as a witness.

5 I declare under penalty of perjury that the foregoing statements are true and correct.  
6

7  
8 Date: October 23, 2019

Leonard K. Welsh  
/s/ Leonard K. Welsh  
LEONARD K. WELSH